

REMARKS

Amendments

Amendments to the Claims

Applicant has amended the independent claims to further define the claimed difference table. No new matter has been added as a result of these amendments because the subject matter was claimed in original claim 3, now cancelled, and is supported in paragraph 27 on pages 8-9 of Applicant's originally filed specification.

Rejections

Rejections under 35 U.S.C. § 101

Claim 24

Claim 24 stands rejected under 35 U.S.C. § 101. Applicant has cancelled claim 24 and thus the rejection is moot.

Rejections under 35 U.S.C. § 102(e)

Claims 1-24

Claims 1-24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Miyasaka, et al, U.S. Patent 6,484,142. Claims 3 and 24 have been cancelled. Applicant does not admit that Miyasaka is prior art and reserves the right to challenge the reference at a later date.

Miyasaka discloses an encoder that selects a Huffman codebook based on resulting code length. Miyasaka teaches a table (such as table 1110 in Figure 9) containing entries associated with four different Huffman codebooks (HCB1, HCB2, HCB3, HCB4). The HCB1 entry in the table "represents code length data which would result when Huffman-encoding data using the Huffman codebook 1. Similarly, "HCB2", "HCB3" and "HCB4" . . . represent the code lengths which would result when encoding data using the Huffman codebooks 2, 3 and 4, respectively." [Miyasaka: col. 23, lines 2-7 (text omitted for clarity)]

In contrast, Applicant claims a difference table that is associated with only two Huffman codebooks. Moreover, Applicant claims that each entry in the table is a value

that is the difference between code length entries in the two associated Huffman codebooks. Because Miyasaka does not disclose a table associated with only two Huffman codebooks, and further because Miyasaka does not even suggest that any of the HCB1-4 entries can be differences between code lengths, Miyasaka cannot be properly interpreted as anticipating Applicant's claimed invention.

Accordingly, Applicant respectfully submits that the invention claimed in claims 1, 2 and 4-23 is not anticipated by Miyasaka under 35 U.S.C. § 102(e) and respectfully requests the withdrawal of the rejection of the claims.

SUMMARY

Claims 1, 2 and 4-23 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-8300 x3476.

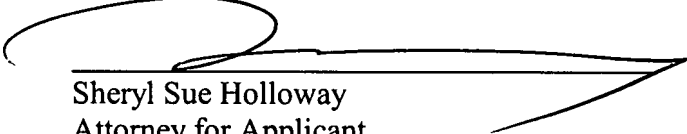
Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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